

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JEFF SAMUELS,

Plaintiff,

v.

**AVT TITLE SERVICES LLC,
DEUTSCHE BANK NATIONAL
TRUST CO., PHH MORTGAGE CORP.,
POWER DEFAULT SERVICES INC.,**

Defendants.

JOANNA BURKE,

Intervenor-Plaintiff,

v.

**AVT TITLE SERVICES LLC,
DEUTSCHE BANK NATIONAL
TRUST CO., PHH MORTGAGE CORP.,
POWER DEFAULT SERVICES INC.,**

Intervenor-Defendants.

§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 4:23-cv-04687

**DEFENDANT AVT TITLE SERVICES, LLC'S SUPPLEMENT TO
NOTICE OF REMOVAL**

Defendant AVT Title Services, LLC (“AVT” or “Defendant”) files this Supplement to Defendants PHH Mortgage Corporation, Deutsche Bank National Trust Company, as Trustee for FFMLT Trust 2004-FF3, Mortgage Pass-Through Certificates, Series 2004-FF2, and Power Default Services, Inc.’s Notice of Removal (ECF No. 1), and shows as follows:

I.

Defendant supplements the Notice of Removal, filed at ECF No. 1, with the following additional documents from the state court action:

INDEX OF STATE COURT DOCUMENTS

- Exhibit A Cause No. 2023-59141, *Jeff Samuels v. AVT Title Services, et al.*; in the 234th Judicial District Court, Harris County, Texas.
- A-17 Defendant AVT Title Services, LLC's Original Answer and Verified Denial to Intervenor-Plaintiff's Petition in Intervention, filed on December 15, 2023.

Respectfully submitted,

By: /s/ Cheyenne D. Haley
MARK D. CRONENWETT
Attorney-in-Charge
Texas Bar No. 00787303
Southern Dist. No. 21340
mcronenwett@mwzmlaw.com

CHEYENNE D. HALEY
Texas Bar No. 24131883
Southern Dist. No. 3849419
chaley@mwzmlaw.com

MACKIE WOLF ZIENTZ & MANN, P. C.
14160 North Dallas Parkway, Suite 900
Dallas, Texas 75254
Telephone: (214) 635-2650
Facsimile: (214) 635-2686

*Attorneys for Defendant/Intervenor-Defendant AVT
Title Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on December 27, 2023 as stated below on the following:

VIA U.S. Mail and E-Mail:

Joanna Burke
joanna@2dobermans.com
46 Kingwood Greens Drive
Kingwood, Texas 77339
Pro Se Intervenor Plaintiff

VIA U.S. Mail and E-Mail:

Jeff Samuels
14810 Winding Waters Drive
Cypress, Texas 77429
Jeff.uben@gmail.com
Pro Se Plaintiff

VIA ECF Notification:

Alex del Rio
adelrio@bakerdonelson.com
Emily Stroope
estroope@bakerdonelson.com
Baker Donelson Bearman Caldwell &
Berkowitz, PC
1301 McKinney Street, Suite 3700
Houston, Texas 77010
*Counsel for PHH Mortgage Corporation,
Power Default Services, Inc., and Deutsche
Bank National Trust Corporation , as
Trustee*

/s/ Cheyenne D. Haley
CHEYENNE D. HALEY